

Rory Valas

From: Rory Valas [rav@franchiseelaw.com]
Sent: Monday, April 14, 2008 5:53 PM
To: 'Danielle M. Kays'
Subject: RE: Kelley Deposition

Danielle:

Did you clear the time and location with Ms. Kelley? It sounded like the date and location that you noticed was going to be burdensome for her.

Rory

From: Danielle M. Kays [mailto:danielle.kays@chengcohen.com]
Sent: Monday, April 14, 2008 4:46 PM
To: Rory Valas
Subject: RE:

Rory:

Though not required, see my email dated March 19 and follow-up on March 20 and 21 and April 2 which document our attempt to schedule the depositions with your office. Attached is an amended deposition notice for Christina Kelley and Pali Shah which will proceed this week. The remaining depositions scheduled for April 15, 16 and 17 are being rescheduled.

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From: Rory Valas [mailto:rav@franchiseelaw.com]
Sent: Monday, April 14, 2008 2:51 PM
To: Danielle M. Kays
Subject:

Danielle:

Attached is a statement from the ninth of the ten contract employees that you sought to depose this week. We forwarded e-mails to you from eight of the others and the tenth evidently is away on vacation.

As there was no effort to actually schedule the depositions with my office or with the witnesses, I am not planning on being in Chicago for those depositions. However, I will be in town for Ms. Shah's deposition on Friday.

4/30/2008

I will also be in town for Mr. Conran April 21 and Mr. Lichtenstein April 22.

We need to discuss the location in New Jersey and the availability of the computer for Ms. Tumbukon April 23.

FYI, my client indicated that the vacant office near her learning center may be available as a convenient location for the depositions of the contract employees.

Rory Valas

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